

Second Declaration of Riaz Masih

I, Riaz Masih, declare under penalty of perjury under the laws of the United States that the following is true:

1. I am the husband of Rehana Bibi. I live in Lahore, Pakistan. A copy of my Pakistani Identification Card is attached hereto.
2. The declaration of Faisal Masih (ECF 45-1) has been read to me in Urdu and I have understood it. Some of it is true. Much of it is false.
3. On July 5, 2021, I went to Faisal's home. My son-in-law Akash Buta came with me. Akash had his two-year-old daughter with him.
4. I went to Faisal's house because my other son-in-law, Noman Shazad, told me that Faisal had told Naman that Faisal was sending documents to Shaheena Shakil-ur-Rahman in order to help her with my wife's lawsuit. I did not know what Faisal was allegedly sending to Shaheena, and was unaware of anything he had, or might have, that could help Shaheena or hurt Rehana in the lawsuit. Nevertheless, I wanted him to explain why he was sending my wife's documents to someone my wife was suing. This is what I asked him. The conversation lasted approximately five minutes.
5. Faisal was defensive about my question. He said he was doing this because he believed I had told the community that Shaheena had sent his family food after the death of his father. I told Faisal that I never told anyone that Shaheena sent his family food.
6. Faisal and his wife, Mehvish Anwar, receive financial assistance from Shaheena. This financial assistance started shortly after Rehana filed her lawsuit. I have been made aware of this through Adeel Anwar, Mehvish's brother, and Khurum Anwar, Mehvish's other brother.
7. I did not ask Faisal to say anything untrue to anyone at any time. I understood that

we were all required to tell the truth if called upon to do so, and expected him to do so, as I expected to do so myself, were we called as witnesses in the lawsuit. I had no idea what Faisal might be able to contribute to the case—either helpful or harmful to Rehana—since to my knowledge he had no personal knowledge of any facts relevant to the dispute. Nevertheless, I was troubled that as a family member he was, as I had been told, providing assistance of one sort or another to the other side. I understood that he was beholden to Shaheena for her provision of assistance to him and his family, but did not believe that this overrode his familial obligations to stay at least neutral in the dispute.

8. I did not threaten Faisal or any of his family members in any way, at any time. The claims set forth in ¶¶ 8-9 of Faisal's statement are regrettable defamatory fabrications. I was unaware of anything that Faisal could actually do to harm Rehana in her lawsuit, and spoke to him as a matter of moral and familial obligation. I have never been involved in violent or other criminal behavior. I have no criminal record. The notion that I would threaten or harm Faisal or anyone else, be it his brothers or his mother, is preposterous. I have never had any connection with gangs or kidnappers and would not know where to begin to secure their assistance. I have no influence whatsoever with the police. While I have a childhood friend named Bilal, I would never ask him, nor did I ever ask him, to force Faisal to "cooperate" with Rehana's case. I had no idea, and today have no idea, how Bilal might so "force" him, nor how Faisal might so "cooperate."

9. Faisal and I had been on good terms before Rehana filed her lawsuit. His attitude toward me changed thereafter. I do not know why this is so, but I believe it may be the result of Shaheena's provision of assistance to Faisal and his family.

10. I will testify in court as needed in accordance with the declarations I have made in this case.

11. I cannot read English. This document has been translated for me into Urdu, which I understand, and I understand what this document says. What is stated here is true.

Dated: July 29, 2021

RIAZ MASIH
Riaz Masih

DECLARATION OF TRANSLATOR

I, Khadeja Tipu, declare under penalty of perjury that the following is true:

- I am competent to translate from Urdu into English and from English into Urdu.
- On the date set forth above, I spoke with Rehana Bibi by phone. I translated the text of the above declaration into Urdu. I asked if she understood what I said, and she affirmed that she did.
- I am co-counsel to Plaintiff Rehana Bibi in this case, and make this statement in accordance with Rule 11, *Fed. R. Civ. P.*

Dated: July 29, 2021

Khadeja Tipu
Khadeja Tipu